

**JAKAB**  
L A W

**CEL**  
**A**

Digitally signed  
by CELA  
DN: cn=CELA, o,  
ou,  
email=drawls@fe  
c.gov, c=US  
Date: 2016.08.04  
13:21:53 -04'00'

July 28, 2016

**VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED AND EMAIL**  
**([drawls@fec.gov](mailto:drawls@fec.gov) and [jjordan@fec.gov](mailto:jjordan@fec.gov))**

Jeff S. Jordan, Asst. General Counsel  
Federal Election Commission  
Office of Complaints Examination and Legal Admin.  
999 E. Street, NW  
Washington, DC 20463  
Attn: Donna Rawls, Paralegal

RE: **MUR #7091**

Dear Mr. Jordan:

The following Response is being filed on behalf of Frederick Carroll, Treasurer (Carroll) for the Charlie Crist for U.S. Senate (Campaign) in reference to MUR #7091. For reasons stated herein, Carroll and the Campaign respectfully request that this matter be dismissed and no action be taken against Mr. Carroll as Treasurer for Charlie Crist for U.S. Senate or the Campaign.

**I. SUMMARY OF RESPONSE**

Our client requests dismissal of this Complaint upon the following grounds.

1. There exists no allegation in the Complaint that Carroll or the Campaign violated the Federal Election Campaign Act (FECA) within the applicable five (5) year statute of limitations, pursuant to 28 USC § 2462.
2. There exists no reasonable belief that Carroll or the Campaign violated FECA as the allegations contained in the subject Complaint are speculative and directly refuted by competent, substantial, and verifiable documentary evidence.

**II. FACTUAL BACKGROUND AND ARGUMENT**

**A. The Complaint Is Barred By The Applicable Statute Of Limitations**

The Senate Leadership Fund (SLF/Complainant) sets forth two (2) alleged fundraising violations on the part of Carroll and the Campaign. In particular, on the last page of the Complaint, SLF states:

"...Charlie Crist and the campaign committees are also in violation

170444114731

of 52 USC § 30122, which prohibits a person from accepting contributions made in the name of another person”...

“Ibrahim Al-Rashid exceeded the contribution limits of 52 USC § 30116 with respect to Charlie Crist in 2010...”.

SLF makes no other allegations of wrongdoing on the part of Carroll or the Campaign.

As a threshold matter, SLF has not alleged Carroll or the Campaign violated said statutes within the applicable limitations period of five (5) years, pursuant to 28 USC § 2462. Pursuant to FEC v. Williams, 104 F.3d 237 (9<sup>th</sup> Cir. 1996), *cert denied*, 522 US 1015 (1997), and progeny, the general federal five [5] year statute of limitations, 28 USC § 2462, applies to FEC civil enforcement actions that seek the imposition of civil penalties.

In its Complaint, SLF names a number of individuals (alleged strawmen) it contends improperly donated money to the Campaign, via Ibrahim Al-Rashid. In particular, SLF contends a group of donors in Pennsylvania (linked to Al-Rashid's ex-wife, Morgan Budman) and Texas (linked to Al-Rashid's half-brother and housekeeper) served as strawmen for donations Mr. Al-Rashid made to the Campaign.

Exhibit B of SLF's Complaint is a spreadsheet of alleged strawmen donors. However, none of said donors made any contribution to the Charlie Crist Campaign *after* September 13, 2010. As result, in the event any of said donations were improper—which is not the case—any action taken by the FEC against our client regarding said donations would be time barred.

**B. There Exists No Reason To Believe Carroll Or The Campaign Violated 52 USC § 30122 or 52 USC § 30116**

There exists no competent, substantial, credible evidence in this case that Carroll or the Campaign violated FECA, and, in particular, the sections cited in the Complaint. In fact, the evidence presented herein conclusively establishes that Carroll and the Campaign did not violate FECA and fully followed FECA regarding campaign contributions to the Campaign.

SLF set forth no sworn affidavits from persons with knowledge of any particular campaign finance violation regarding Carroll or the Campaign. Moreover, SLF did not bring forth any documentary evidence, in the form of checks, receipts, or banking records, to indicate there were improper donations to the Campaign.

Instead, SLF focuses on alleged tenuous relationships between Patrick Murphy, Ibrahim Al-Rashid, Ibrahim Al-Rashid's ex-wife, and Charlie Crist to reach the speculative conclusion that “suspicious” donations were made to both campaigns. This form of inference stacking does not result in a reasonable belief of a FECA violation, per 52 USC § 30122 or 52 USC § 30116.

Simply put, SLF has not brought forth even a scintilla of competent, substantial, and credible evidence, that any group of donors in Pennsylvania and Texas, respectively, made improper

Jeff S. Jordan, Asst. General Counsel  
July 28, 2016  
Page 3

donations to the Campaign. In fact, the opposite is true.

In direct rebuttal to these allegations, see attached Exhibit A. Exhibit A contains a list of donors to the Crist Campaign that SLF contends were improper strawmen and copies of the checks Carroll and the Campaign received from each donor at issue.

An analysis of these checks indicates that the donors at issue contributed to the campaign, individually, and in amounts that did not exceed the contribution limits applicable in 2010, pursuant to 52 USC § 30116 (\$2,400 per election [primary + general]). Furthermore, the checks are dated and signed by each donor SLF alleged were strawmen donors.

Lastly, this evidence also conclusively establishes that Mr. Al-Rashid did not exceed contribution limits applicable in 2010, in his own right—as alleged in the Complaint.

### III. CONCLUSION

Any and all alleged violations of FECA in the subject Complaint as to Carroll and the Campaign are time barred. Additionally, SLF has not set forth competent and credible evidence that Carroll or the Campaign violated FECA, but instead relied upon tenuous circumstantial evidence and inference stacking to reach false conclusions. These speculative and false conclusions are directly contradicted by the evidence set forth herein.

For these reasons, Mr. Carroll and the Campaign respectfully request dismissal of the subject Complaint as there exists no reason to believe any violation of the Federal Election Campaign Act occurred, either on the part of Mr. Carroll, or the Campaign.

Respectfully submitted on behalf of Frederick Carroll, Treasurer and Charlie Crist for U.S. Senate Campaign,

KEVIN E. JAKAB, ESQ.



KEJ:llr  
Enclosure

# Exhibit A

17044414734

Contributor	Recipient	Date	Amount	Reported Occupation/Employer
Morgan Budman	Crist	March 18, 2010	\$4,800	
Ibrahim Al-Rashid	Crist	March 18, 2010	\$4,800	
Gene Earley	Crist	March 18, 2010	\$2,400	Personal Assistant, Limestone Prop. Mgmt. Co.
Bonnie Butler	Crist	March 18, 2010	\$2,400	Office Manager, Limestone Prop. Mgmt. Co.
Ellen Budman	Crist	May 7, 2010	\$4,800	Superintendent, Bristol Township School District
Lila Benjamin	Crist	May 7, 2010	\$3,000	Superintendent, Bristol Township School District
Aaron Orchinik	Crist	May 7, 2010	\$2,400	Commercial Insurance Broker, Brown & Brown
Barbara Earley	Crist	May 7, 2010	\$1,500	Dentist, Self-Employed
Steve Budman	Crist	June 21, 2010	\$2,400	Consultant, Croker Fire Safety
Badillo, Millerlandy	Crist	June 30, 2010	\$1,200	Owner, Limestone Property Management
Steve Budman	Crist	September 13, 2010	\$2,400	Consultant, Croker Fire Safety
Evan Orchinik	Crist	September 13, 2010	\$600	Owner, Fitlife Gym
Bonnie Butler	Crist	September 13, 2010	\$1,200	Office Manager, Limestone Prop. Mgmt. Co.
Morgan Budman	Murphy	March 7, 2011	\$5,000	
Ibrahim Al-Rashid	Murphy	March 7, 2011	\$5,000	
Badillo, Millerlandy	Murphy	March 8, 2011	\$300	Property Manager, Limestone Property Management
Aileen Orchinik	Murphy	March 8, 2011	\$500	Teacher, Pennsbury School District
Bruce Butler	Murphy	March 8, 2011	\$400	Owner, Butlers Custom Wallcovering
Bonnie Butler	Murphy	March 8, 2011	\$400	Office Manager, Limestone Property Mgmt. Co.
Gene Earley	Murphy	March 8, 2011	\$500	Administrative Manager, Gene Earley
Barbara Earley	Murphy	March 9, 2011	\$500	Dental Hygienist, Barbara Earley DDS
Evan Orchinik	Murphy	March 11, 2011	\$1,000	Owner, Fit For Life

Contributor	Recipient	Date	Amount
Morgan Budman	Murphy	March 7, 2011	\$5,000
Ibrahim Al-Rashid	Murphy	March 7, 2011	\$5,000
Aileen Orchinik	Murphy	March 8, 2011	\$500
Evan Orchinik	Murphy	March 11, 2011	\$1,000
Lila Benjamin	Murphy	March 11, 2011	\$1,500
Steve Budman	Murphy	March 11, 2011	\$2,500
Ellen Budman	Murphy	March 11, 2011	\$2,500
Ellen Budman	Murphy	March 19, 2011	\$2,500
Steve Budman	Murphy	April 5, 2011	\$2,500
Aileen Orchinik	Murphy	August 22, 2011	\$500
Evan Orchinik	Murphy	September 15, 2011	\$500

The above-listed members of Morgan Budman's family in Pennsylvania have made federal contributions to only one other candidate, in a similarly-clustered group of contributions, to Charlie

Crist in 2010. (At the time, Crist claimed to be a Republican. Crist is reportedly a friend of the Murphy family, and Patrick Murphy's father, Thomas J. Murphy, Jr., has supported Crist's various campaigns and Super PACs supporting Crist.<sup>5</sup>)

Contributor	Recipient	Date	Amount
Morgan Budman	Crist	March 18, 2010	\$4,800 ✓
Ibrahim Al-Rashid	Crist	March 18, 2010	\$4,800 ✓
Ellen Budman	Crist	May 7, 2010	\$4,800 ✓
Lila Benjamin	Crist	May 7, 2010	\$3,000 ✓
Aaron Orchinik	Crist	May 7, 2010	\$2,400 ✓
Steven Budman	Crist	June 21, 2010	\$2,400 ✓
Steve Budman	Crist	September 13, 2010	\$2,400 ✓
Evan Orchinik	Crist	September 13, 2010	\$600

Ellen Budman and Lila Benjamin listed the same address for their May 7, 2010 contributions, and both claimed to be the Superintendent of Bristol Township Schools. When Ms. Benjamin contributed to Patrick Murphy in 2011, she listed a different address and reported that she was retired.

Finally, Millerlandy Badillo contributed \$1,200 to Charlie Crist on June 30, 2010, and \$300 to Patrick Murphy on March 8, 2011. On Crist's FEC report, Ms. Badillo lists a Miami address, but is identified as the "Owner" of Limestone Property Management. On Murphy's FEC report, Ms. Badillo again lists a Miami address, but is identified as the "Property Manager" of Limestone Property Management. As detailed below, Limestone Property Management is located in Austin, Texas. On an August 2012 police report regarding a burglary at Ibrahim Al-

<sup>5</sup> See George Bennett, "Crist won't run for U.S. Senate in 2016, clearing way for Murphy," *Palm Beach Post* (March 16, 2015), <http://www.palmbeachpost.com/news/news/state-regional-govt-politics/martin-sheriff-anyder-shuts-door-on-run-for-murphy/nkXyz/>.

Rashid's home; Ms. Badillo is identified as Ibrahim Al-Rashid's "cleaning lady." See Exhibit A. In addition, on information and belief, Ms. Badillo has also cleaned for Patrick Murphy's parents.

#### B. Texas Donor Network

A similar donor network existed in Texas at the same time, and included Gene Earley, Barbara Earley, Bruce Butler, and Bonnie Butler. These four individuals are linked to Ibrahim Al-Rashid and Ramzi Al-Rashid, who we believe to be the half-brother of Ibrahim Al-Rashid. Ramzi Al-Rashid is listed as the registered agent for Limestone Property Management Company, Inc., in Austin, Texas. Ibrahim Al-Rashid is a manager/member ("MGMR") of Salmira Virginia Properties, LLC, and the now inactive Limestone WCR, LLC, both of which share an address with Limestone Property Management Company, Inc., at 1114 Lost Creek Boulevard, Suite 120, Austin, Texas 78746.

Contributor	Recipient	Date	Amount
Gene Earley ✓	Crist	March 18, 2010	\$2,400
Bonnie Butler ✓	Crist	March 18, 2010	\$2,400
Barbara Earley ✓	Crist	May 7, 2010	\$1,500
Bonnie Butler	Crist	September 13, 2010	\$1,200
Bruce Butler	Murphy	March 8, 2011	\$400
Bonnie Butler	Murphy	March 8, 2011	\$400
Gene Earley	Murphy	March 8, 2011	\$500
Barbara Earley	Murphy	March 9, 2011	\$500
Gene Earley	Murphy	August 25, 2011	\$1,000
Gene Earley	Murphy	August 30, 2011	\$1,000
Barbara Earley	Murphy	November 14, 2011	\$750
Bonnie Butler	Murphy	November 14, 2011	\$500

According to FEC reports, Gene Earley works (or worked) in "Property Management" at "Limestone Management," and Bonnie Butler was the "Project Manager" and "Office Manager" at "Limestone Property Mgmt. Co., Inc." Different occupation and employer information is listed for each of Barbara Earley's three contributions. She is either a self-employed dentist, a dental hygienist/office manager who works for Dr. Mendez, or a dental hygienist with her own dental practice. Like the Pennsylvania donors listed above, these Texas-based contributors have no other federal donation history.

\*\*\*\*\*

The clustering of contributions among these two groups and the absence of any other federal contribution history among the donors is highly suspicious. The only evident connection between these people is Ibrahim Al-Rashid. Taken together, there is a strong reason to suspect that both the Pennsylvania Donor Network and the Texas Donor Network are, in fact, networks of straw donors that either participated in an unlawful scheme to funnel Ibrahim Al-Rashid's contributions, or were used by Al-Rashid to funnel contributions without their knowledge. The inconsistent and changing employer and occupation information listed for some of these

**Name: Ibrahim Al-Rashid**  
**Occupation: Financial Consultant**  
**Employer: N/A**

**Miami Beach, Florida**  
**33139**

**Name: Salman Al-Rashid**  
**Occupation: Executive Assistant**  
**Employer: Limestone Properties Management, Co.**

**Name: Mohammad Al-Rashid**  
**Occupation: Student**  
**Employer: N/A**

**Name: Gene Earley**  
**Occupation: Personal Assistant**  
**Employer: Limestone Properties Management, Co.**

**Name: Harvey Boshart**  
**Occupation: Stockbroker**  
**Employer: JP Morgan**

**Name: Morgan Budman**  
**Occupation: Non Profit Fundraiser**  
**Employer: March of Dimes**



MORGAN J. RINDMAN


CORAL GABLES, FL USA 33134

NO 312510

312510

Date 3/6/10

1343

Pay to the order of: Charlie Cent for U.S. Senator \$ 4800.00  
Four thousand and eight hundred <sup>00/100</sup> dollars   
citibank

CITIBANK, F.S.B. BR. #519  
1100 SOUTH MIAMI HIGHWAY  
CORAL GABLES, FL 33134

Memo Donation / Cent.

Morgan J. Rindman

17044414739

# Charlie Crist

FOR UNITED STATES SENATE

April 5, 2010

Mrs. Morgan Budman

Coral Gables, FL 33134

Dear Morgan:

Thank you for your contribution to Charlie Crist for U.S. Senate. With your help, Governor Crist will be able to spread his positive message to even more Floridians.

As you may know, the strict requirements of federal campaign finance law limit individual contributions to \$2,400 per person per election. Your contribution to Charlie Crist for U.S. Senate, either alone or aggregated with previous contributions, exceeds this amount for the 2010 primary election. However, it is possible to redesignate up to \$2,400 to the 2010 general election. Therefore, we have redesignated your contribution as follows:

\$2,400 to the Primary Election from Morgan Budman

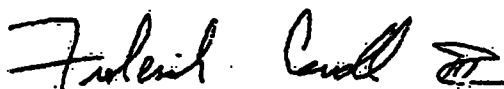
\$2,400 to the General Election from Morgan Budman

If you prefer to have the excessive contribution amount refunded, please notify us. You may fax a request to 850-878-7000.

If you have any questions, please call our compliance office at 850-877-1099.

Once again, thank you for your generous financial support and your prompt attention to this matter.

Sincerely,



Frederick Carroll III, CPA  
Treasurer

Paid for by Charlie Crist for U.S. Senate

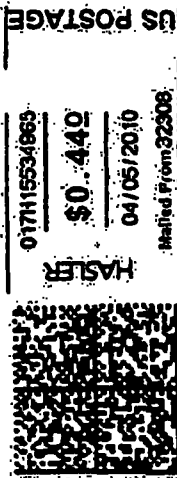
P.O. Box 1694  
Tallahassee, FL 32302

Contributions to Charlie Crist for U.S. Senate are not deductible for Federal income tax purposes. Contributions by corporations, labor unions and foreign nationals are prohibited. Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in an election cycle. [www.CharlieCrist.com](http://www.CharlieCrist.com)

Charlie Crist for U.S. Senate  
2640-A Mitchell Drive  
Tallahassee, FL 32308

Mrs. Morgan Budman

Coral Gables, FL 33134



**Name: Ibrahim Al-Rashid**  
**Occupation: Financial Consultant**  
**Employer: N/A**

✓ **Miami Beach, Florida**  
**33139**

**Name: Salman Al-Rashid**  
**Occupation: Executive Assistant**  
**Employer: Limestone Properties Management, Co.**

**Name: Mohammad Al-Rashid**  
**Occupation: Student**  
**Employer: N/A**

**Name: Gene Earley**  
**Occupation: Personal Assistant**  
**Employer: Limestone Properties Management, Co.**

**Name: Harvey Boshart**  
**Occupation: Stockbroker**  
**Employer: JP Morgan**

**Name: Morgan Budman**  
**Occupation: Non Profit Fundraiser**  
**Employer: March of Dimes**

1  
0  
4  
4  
4  
4  
4  
2

**, 065000074**

2022

~~AUSTIN, TX 78748~~

DATE MARCH 10, 2013

CHARLIE CRIST FOR U.S. SENATE \$ 4,800.00  
FOUR THOUSAND EIGHT HUNDRED / ~~Sixty~~ 6



**LYDIAN<sup>TM</sup>**  
**BANK & TRUST.**  
A Division of Lydian Financial Bank

Cont. Contn. 9/1  
1992 1992-1992

## Money Market

**Sliding**

**POLITICAL CONTRIBUTION**

49

**1404561-2**

# Charlie Crist

FOR UNITED STATES SENATE

April 5, 2010

Mr. Ibrahim Nasser Al-Rashid

Miami Beach, FL 33139

Dear Ibrahim:

Thank you for your contribution to Charlie Crist for U.S. Senate. With your help, Governor Crist will be able to spread his positive message to even more Floridians.

As you may know, the strict requirements of federal campaign finance law limit individual contributions to \$2,400 per person per election. Your contribution to Charlie Crist for U.S. Senate, either alone or aggregated with previous contributions, exceeds this amount for the 2010 primary election. However, it is possible to redesignate up to \$2,400 to the 2010 general election. Therefore, we have redesignated your contribution as follows:

\$2,400 to the Primary Election from Ibrahim Nasser Al-Rashid

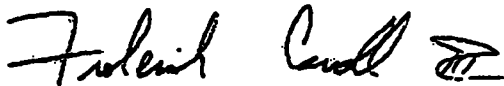
\$2,400 to the General Election from Ibrahim Nasser Al-Rashid

If you prefer to have the excessive contribution amount refunded, please notify us. You may fax a request to 850-878-7000.

If you have any questions, please call our compliance office at 850-877-1099.

Once again, thank you for your generous financial support and your prompt attention to this matter.

Sincerely,



Frederick Carroll III, CPA  
Treasurer

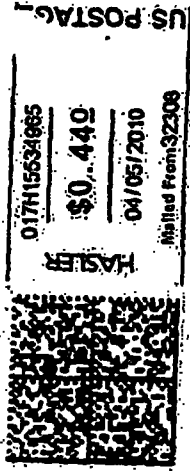
Paid for by Charlie Crist for U.S. Senate

P.O. Box 1694  
Tallahassee, FL 32302

Contributions to Charlie Crist for U.S. Senate are not deductible for Federal income tax purposes. Contributions by corporations, labor unions and foreign nationals are prohibited. Federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in an election cycle. [www.CharlieCrist.com](http://www.CharlieCrist.com)

Charlie Crist for U.S. Senate  
2640-A Mitcham Drive  
Tallahassee, FL 32308

170444444445



Mr. Ibrahim Nasser Al-Rashid

Miami Beach, FL 33139

**Name: Ibrahim Al-Rashid**  
**Occupation: Financial Consultant**  
**Employer: N/A**

**Miami Beach, Florida**  
**33139**

**Name: Salman Al-Rashid**  
**Occupation: Executive Assistant**  
**Employer: Limestone Properties Management, Co.**

**Name: Mohammad Al-Rashid**  
**Occupation: Student**  
**Employer: N/A**

**Name: Gene Earley**  
**Occupation: Personal Assistant**  
**Employer: Limestone Properties Management, Co.**

**Name: Harvey Boshart**  
**Occupation: Stockbroker**  
**Employer: JP Morgan**

**Name: Morgan Budman**  
**Occupation: Non-Profit Fundraiser**  
**Employer: March of Dimes**

17844414746



GENE E. EARLEY  
BARBARA J. EARLEY

AUSTIN, TX 78759

1110  
140202883

1483

DATE 03/08/10

PAY TO THE  
ORDER OF

CHARLIE CRIST FOR U.S. SENATE \$ 2,400.00

TWO THOUSAND FOUR HUNDRED DOLLARS

CHASE

JPMorgan Chase Bank, N.A.  
Dallas, Texas 75201  
www.chase.com

MEMO

Camacho, Carlos

Gene E. Earley

17044414747



# Charlie Crist for US Senate

<http://www.charliecrist.com/>

Please Fax to:  
850-907-1219  
OR  
Please send the form to:  
2640A Mitchem DR  
Tallahassee, FL 32308

## A DONATION AMOUNT

- ☐ \$25      ☐ \$100      ☐ \$1000  
☐ \$50      ☐ \$250      ☐ \$2400  
☐ Other \_\_\_\_\_  
☐ Yes, I would like to make this a monthly contribution.

Start Date: \_\_\_\_\_ End Date: \_\_\_\_\_

eg.: 

D	D	M	M	Y	Y
---	---	---	---	---	---

 eg.: 

D	D	M	M	Y	Y
---	---	---	---	---	---

## B SECURE CONTRIBUTION INFORMATION

Type of Transaction:



Credit Card Number: \_\_\_\_\_

Card CVV: \_\_\_\_\_

\* Visa, Master Card CVV printed on back of card.  
\* AMEX Card CVV printed on front or back of card.

Name as it appears on credit card or check

First Name: Donnie

Last Name: Butler

E-mail Address: J S L

Billing Address: 11331 Hwy 71 W

Austin, TX 78735

Zip/Postal: 78735 State/Province: TX

City: \_\_\_\_\_

Country: USA

Phone: \_\_\_\_\_

## C ADDITIONAL INFORMATION

Is your billing address different then your home address?

☐ Yes ☒ No

If Yes, please provide details here.

Billing address: \_\_\_\_\_

Zip/Postal: \_\_\_\_\_ State/Province: \_\_\_\_\_

City: \_\_\_\_\_

Country: \_\_\_\_\_

Phone: \_\_\_\_\_

What type of credit card is this?

- ☐ Personal      ☐ Corporate  
☐ Organization      ☐ Spouse  
☐ Other (Please specify below)

## D COMPLIANCE INFORMATION (required by law)

Employer: Limestone Property Mgmt. Co. Inc

Occupation: Office

PAC: \_\_\_\_\_

Business: \_\_\_\_\_

## E YES! I agree to process my contribution. Please sign here

Authorized Signature:

Donnie Butler

Date: 3/8/2010


Donnie Butler  
please print name

11331 W. HIGHWAY 71  
AUSTIN, TX 78735

Date 3/10/10

0019  
35-2/1130 TX  
4157

Pay to the Order of Charlie Crist For US Senate \$ 2,400.00

Two Thousand Four Hundred ————— Dollars 

Bank of America

ACH 811-111000025

For Donation

Brian B. Smith

17044412749

# Charlie Crist

FOR UNITED STATES SENATE

CONTRIBUTION FORM | ALL INFORMATION MUST BE COMPLETED

Date: 4/27/10

Federal law requires us to collect and report the name, mailing address, occupation and name of employer for each individual whose contributions exceed \$200 in a calendar year. Please provide the following.

Name of Contributor(s): Ellen and Steven Budman

Billing Address: 438 Fox Hollow Dr.

City: Langhorne State: Pa Zip: 19053

Mailing Address: \_\_\_\_\_

Cell Phone: \_\_\_\_\_ Work Phone: \_\_\_\_\_ Email address: \_\_\_\_\_

Occupation(s): \_\_\_\_\_ (Please provide for each contributor listed)

Employer(s): \_\_\_\_\_ (Please provide for each contributor listed)

Total amount of contribution: \$ 4800 Please complete information below:

Contribution of \$ 2400 from (name) \_\_\_\_\_ Amt. for Primary ☒ General \_\_\_\_\_

Contribution of \$ 2400 from (name) \_\_\_\_\_ Amt. for Primary \_\_\_\_\_ General ☒

(Individuals can contribute up to \$2,400 for the Primary Election and up to \$2,400 for the General Election for a total contribution limit of \$4,800 per individual in an election cycle)

PAYMENT TYPE \_\_\_\_\_

☒ CHECK/MONEY ORDER

☐ CREDIT CARD (Mark type of credit card contribution)

\_\_\_\_\_ American Express \_\_\_\_\_ Discover \_\_\_\_\_ Mastercard \_\_\_\_\_ Visa

By checking here, I certify that this contribution is made from my own personal funds with a personal credit card, and not with a corporate or business credit card or funds provided to me by another person.

Card Number: \_\_\_\_\_ Exp. Date: \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

Security Code (3-4 Digit on back card): \_\_\_\_\_

Name(s) on credit card? \_\_\_\_\_ (Cannot be in the name of a business)

Signature(s): \_\_\_\_\_

(Must have a signature for each contributor listed above)

Date: \_\_\_\_\_

Contributions to the Charlie Crist for US Senate campaign are not deductible as charitable contributions for federal income tax purposes. Contributions from corporations, foreign nationals and labor unions are prohibited.

Charlie Crist for US Senate, P.O. Box 1694, Tallahassee, FL 32302 \* Office: 850-907-1218 \* Fax: 850-907-1218 \* www.CharlieCrist.com

Paid for by Charlie Crist for US Senate.

# POSTALHORN

# Charlie Crist

FOR UNITED STATES SENATE

CONTRIBUTION FORM | ALL INFORMATION MUST BE COMPLETED

Date: 4/25/10

Federal law requires us to collect and report the name, mailing address, occupation and name of employer for each individual whose contributions exceed \$200 in a calendar year. Please provide the following.

Name of Contributor(s): Ellen Budman and Lila Benjamin

Billing Address: 438 Fox Hollow Dr.

City: Langhorne State: PA Zip: 19053

Mailing Address: \_\_\_\_\_

Cell Phone: \_\_\_\_\_ Work Phone: \_\_\_\_\_ Email address: \_\_\_\_\_

Occupation(s): School Superintendent (Please provide for each contributor listed)

Employer(s): Bristol Township School District (Please provide for each contributor listed)

Total amount of contribution: \$ 3000 Please complete information below:

Contribution of \$ 2400 from (name) \_\_\_\_\_ Amt. for Primary X General \_\_\_\_\_

Contribution of \$ 600 from (name) \_\_\_\_\_ Amt. for Primary \_\_\_\_\_ General X

(Individuals can contribute up to \$2,400 for the Primary Election and up to \$2,400 for the General Election for a total contribution limit of \$4,800 per individual in an election cycle)

PAYMENT TYPE \_\_\_\_\_

X CHECK/MONEY ORDER  
\_\_\_\_ CREDIT CARD (Mark type of credit card contribution)

\_\_\_\_ American Express \_\_\_\_ Discover \_\_\_\_ Mastercard \_\_\_\_ Visa

\_\_\_\_ By checking here, I certify that this contribution is made from my own personal funds with a personal credit card, and not with a corporate or business credit card or funds provided to me by another person.

Card Number: \_\_\_\_\_ Exp. Date: \_\_\_\_\_ / \_\_\_\_\_

Security Code (3-4 Digit on back card): \_\_\_\_\_

Name(s) on credit card? \_\_\_\_\_ (Cannot be in the name of a business)

Signature(s): \_\_\_\_\_

(Must have a signature for each contributor listed above)

Date: \_\_\_\_\_

Contributions to the Charlie Crist for US Senate campaign are not deductible as charitable contributions for federal income tax purposes. Contributions from corporations, foreign nationals and labor unions are prohibited.

Charlie Crist for US Senate, P.O. Box 1694, Tallahassee, FL 32302 \* Office: 850-907-1218 \* Fax: 850-907-1219 \* www.CharlieCrist.com

Paid for by Charlie Crist for US Senate.

MEMO #81

ELLEN BUDMAN  
LILA BENJAMIN

127

3-0422/2300  
BRANCH 1

PAY TO THE ORDER OF

*April 25 2011*  
*Public Cust for US Senate* \$ 3,000.00/100  
*Three thousand and 00/100* DOLLARS

POLICE AND FIRE FEDERAL CREDIT UNION  
www.pffcu.org

FOR

*Lila Benjamin*

170644114440071

# Charlie Crist

FOR UNITED STATES SENATE

CONTRIBUTION FORM | ALL INFORMATION MUST BE COMPLETED

Date: 4, 20, 2010

Federal law requires us to collect and report the name, mailing address, occupation and name of employer for each individual whose contributions exceed \$200 in a calendar year. Please provide the following.

Name of Contributor(s): Aaron Orchinik

Billing Address: 438 Fox Hollow Dr

City: Langhorne State: PA Zip: 19053-2470

Mailing Address: \_\_\_\_\_

Cell Phone: \_\_\_\_\_ Work Phone: \_\_\_\_\_ Email address: \_\_\_\_\_

Occupation(s): Commercial Insurance Broker (Please provide for each contributor listed)

Employer(s): Brown + Brown (Please provide for each contributor listed)

Total amount of contribution: \$ 2,400.00 Please complete information below:

Contribution of \$ 2,400 from (name) Aaron Orchinik Amt. for Primary ☒ General \_\_\_\_\_

Contribution of \$ \_\_\_\_\_ from (name) \_\_\_\_\_ Amt. for Primary \_\_\_\_\_ General \_\_\_\_\_  
(Individuals can contribute up to \$2,400 for the Primary Election and up to \$2,400 for the General Election for a total contribution limit of \$4,800 per individual in an election cycle)

PAYMENT TYPE \_\_\_\_\_

☒ CHECK/MONEY ORDER

\_\_\_\_ CREDIT CARD (Mark type of credit card contribution)

\_\_\_\_ American Express \_\_\_\_ Discover \_\_\_\_ Mastercard \_\_\_\_ Visa

By checking here, I certify that this contribution is made from my own personal funds with a personal credit card, and not with a corporate or business credit card or funds provided to me by another person.

Card Number: \_\_\_\_\_ Exp. Date: \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

Security Code (3-4 Digit on back card): \_\_\_\_\_

Name(s) on credit card? \_\_\_\_\_ (Cannot be in the name of a business)

Signature(s): \_\_\_\_\_

(Must have a signature for each contributor listed above)

Date: \_\_\_\_\_

Contributions to the Charlie Crist for US Senate campaign are not deductible as charitable contributions for federal income tax purposes. Contributions from corporations, foreign nationals and labor unions are prohibited.

Charlie Crist for US Senate, P.O. Box 1694, Tallahassee, FL 32302 \* Office: 850-907-1218 \* Fax: 850-907-1219 \* www.CharlieCrist.com

Paid for by Charlie Crist for US Senate.



1404444071

Miami #1

AARON ORCHINIK  
438 FOX HOLLOW DR.  
LANGHORNE PA 19053-2470

159



Charlie

April 30 2010

60-208/312 P  
14781

Two Thousand and 00/100 \$ 2400.00

Bank of America

ACH RPT 001200000

*[Signature]*

*[Signature]*

# Charlie Crist

FOR UNITED STATES SENATE

CONTRIBUTION FORM | ALL INFORMATION MUST BE COMPLETED

Date: 4, 28, 10

Federal law requires us to collect and report the name, mailing address, occupation and name of employer for each individual whose contributions exceed \$200 in a calendar year. Please provide the following.

Name of Contributor(s): Barbara Earley

Billing Address: 9907 Spicewood Mesa

City: Austin State: TX Zip: 78759

Mailing Address: \_\_\_\_\_

Cell Phone: \_\_\_\_\_ Work Phone: \_\_\_\_\_ Email address: \_\_\_\_\_

Occupation(s): Dentist (Please provide for each contributor listed)

Employer(s): \_\_\_\_\_ (Please provide for each contributor listed)

Total amount of contribution: \$ 1500 Please complete information below:

Contribution of \$ 1500 from (name) \_\_\_\_\_ Amt. for Primary ☒ General \_\_\_\_\_

Contribution of \$ \_\_\_\_\_ from (name) \_\_\_\_\_ Amt. for Primary \_\_\_\_\_ General \_\_\_\_\_  
(Individuals can contribute up to \$2,400 for the Primary Election and up to \$2,400 for the General Election for a total contribution limit of \$4,800 per individual in an election cycle)

PAYMENT TYPE \_\_\_\_\_

☒ CHECK/MONEY ORDER

☐ CREDIT CARD (Mark type of credit card contribution)

☐ American Express ☐ Discover ☐ Mastercard ☐ Visa

By checking here, I certify that this contribution is made from my own personal funds with a personal credit card, and not with a corporate or business credit card or funds provided to me by another person.

Card Number: \_\_\_\_\_ Exp. Date: \_\_\_\_\_ / \_\_\_\_\_

Security Code (3-4 Digit on back card): \_\_\_\_\_

Name(s) on credit card? \_\_\_\_\_ (Cannot be in the name of a business)

Signature(s): \_\_\_\_\_  
(Must have a signature for each contributor listed above)

Date: \_\_\_\_\_

Contributions to the Charlie Crist for US Senate campaign are not deductible as charitable contributions for federal income tax purposes. Contributions from corporations, foreign nationals and labor unions are prohibited.

Charlie Crist for US Senate, P.O. Box 1694, Tallahassee, FL 32302 • Office: 850-907-1218 • Fax: 850-907-1219 • www.CharlieCrist.com

Paid for by Charlie Crist for US Senate.

Bank of America

Account #1

7085

BARBARA J. EARLEY  
8907 SPICEWOOD MESA  
AUSTIN, TX 78759-8304

5-81

35-2/1130 TX  
2558

Date

4/28/10

Pay to the order of

Charlie Crist for US Senate \$150.00

Bank of America

ACH R/T 111000025

Memo

Donation



Signature

Dollars

0

00

17044414757

438 Fox Hollow Drive  
Lansdowne, PA 19053

6/12/2010

4100

Pay to the order of Charlie Crist for rent \$2400.00/100

Two Thousand four hundred and no/100 Dollars

FIRSTTRUST  
800-320-BANK/FIRSTTRUST.COM

For Ellen Bud

\$2400 to Steve

No copy of  
Presumptive Reattribution  
Letter

1-800-444-1100



Ltrd on DOC as Inc  
Can't ltr

Andy Haggard Event - Carol Gables 6-14-10

6/28 - THIS IS A PERSONAL CHECK. LIMESTONE PROPERTY MANAGEMENT IS  
THE EMPLOYER. STILL LOOKING FOR ADDRESS.

STEVEN C BUDMAN

1788

3-0-25/2000  
BRANCH 1

PAY TO THE  
ORDER OF

2/22/00  
CHARLIE CHREST FOR U.S. SALES

DATE

\$ 2400

Twenty Four Hundred

64 DOLLARS

POLICE AND FIRE  
FEDERAL CREDIT UNION  
PHILADELPHIA, PA

FOR

Conclusion

[Signature]

9) Name: Steven Budman

Occupation: Fire Safety Inspections (Owner)

Employer: Owner of Crocker Fire Drill, Philadelphia PA (Fmr. Police Detective Philadelphia, PA)

17044414760

EVAN B. ORCHINIK

55 HEATHER COURT  
NEWTOWN, PA 18940

3-52/310

1660

7/22/10

Date

Charter Crest For US Senate

\$ 600.00

Six Hundred



WACHOVIA

Wachovia Bank, N.A.  
wachovia.com

*[Signature]*

- 7) Name: Evan Orchinik  
Occupation: Owner FitLife Gym  
Employer: FitLife Gym, Philadelphia PA

17044414761

12-000

6636

11331 W. HIGHWAY 73  
AUSTIN, TX 78736

Date 7/21/10

20-2/100 TX  
4007

For the Order of United States Senate \$ 1,200 <sup>00</sup>/<sub>100</sub>  
One thousand two hundred and no Dollars

# Bank of America

Each unit is 75 minutes

Handwritten signature: *John G. Smith*

**13) Name: Bonnie Butler**  
**Occupation: Property Manager**  
**Employer: Limestone Property Management, Austin TX**

170444114762